

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN CARR,)	
)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 05-10445-RBC
SIEMENS DEMATIC CORP., et al.,)	
)	
Defendants.)	
)	
)	
)	

**AMEC CONSTRUCTION MANAGEMENT, INC.'S MOTION TO COMPEL
PLAINTIFF TO COMPLY WITH DISCOVERY REQUESTS**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, AMEC Construction Management, Inc. ("AMEC") moves to compel Plaintiff to respond to document requests propounded by AMEC on December 7, 2005 and to interrogatories propounded by AMEC on December 7, 2005.

The grounds and evidence in support of this motion are presented in the memorandum, Affidavit of Gabriel D. O'Malley, and the Certification of Counsel, all of which are filed herewith. A proposed Order is submitted with this motion.

WHEREFORE, AMEC prays:

- A. That the Court grant AMEC's Motion to Compel Plaintiff to fulfill his discovery obligations.
- B. That the Court award Plaintiff the cost of bringing this motion; and

C. That the Court provide any other just and equitable relief that it deems appropriate.

AMEC CONSTRUCTION
MANAGEMENT INC.

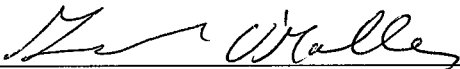
By its attorneys,

/s/ Matthew M. Burke
Matthew M. Burke (BBO # 557281)
Gabriel D. O'Malley (BBO # 651432)
ROPES & GRAY LLP
One International Place
Boston, Massachusetts 02110
(617) 951-7000

Dated: March 13, 2006

CERTIFICATION OF COUNSEL

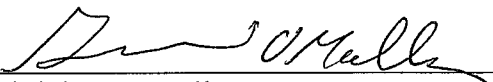
Pursuant to Local Rules 37.1 and 7.1(A)(2) of the United States District Court for the District of Massachusetts and Rule 37 of the Federal Rules of Civil Procedure, I, Gabriel O'Malley, an attorney for AMEC Construction Management, Inc., hereby certify that I have conferred in good faith with Plaintiff's counsel on a number of occasions in an effort to secure the past-due discovery responses without Court action.


Gabriel D. O'Malley (BBO # 651432)

Dated: March 13, 2006

CERTIFICATE OF SERVICE

I hereby certify that this pleading was served by mail upon counsel for all parties on March 13, 2006.


Gabriel D. O'Malley